

COLLECTIVE EXHIBIT A

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and the Proposed Classes*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JAMES PORTER, BRYAN PEREZ, DRO
ESRAEILI ESTEPANIAN, DENNIS
ROMANEZ, ARTEM KUPRIIETS, NEIL
KREUZER, WAFAY NADIR, and
KENNETH BROWN, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

TESLA, INC. d/b/a TESLA MOTORS,
INC.,

Defendant.

Case No. 4:23-CV-03878-YGR

**VENUE DECLARATION OF
DRO ESRAEILI ESTEPANIAN**

DEMAND FOR JURY TRIAL

1 I, DRO ESRAEILI ESTEPANIAN, hereby declare and state as follows:

2 1. I am over the age of 18. The facts contained in this declaration are based upon
3 my personal knowledge, and if called upon to do so, I could and would testify competently
4 hereto.


5 2. I am, and at all times relevant to this Action have been, a resident of Los
6 Angeles County, California.

7 3. In or around December 2021 or January 2022, I ordered a Tesla Model 3 Long
8 Range vehicle through the custom order tool on Tesla's website. In or around July 2022, I took
9 delivery of my Tesla vehicle.

10 4. After receiving my Tesla vehicle, I have noticed while driving the vehicle that I
11 do not receive the electric vehicle range originally advertised.

12 I declare under penalty of perjury under the laws of the United States and of the State of
13 California that the foregoing is true and correct.

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16 DATED: 08/01/2023

By:  _____

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TESLA, INC. d/b/a TESLA MOTORS,
INC.,

Defendant.

Case No. 4:23-CV-03878-YGR

**VENUE DECLARATION OF
BRYAN PEREZ**

DEMAND FOR JURY TRIAL

1 I, BRYAN PEREZ, hereby declare and state as follows:

2 1. I am over the age of 18. The facts contained in this declaration are based upon
3 my personal knowledge, and if called upon to do so, I could and would testify competently
4 hereto.

5 2. I am, and at all times relevant to this Action have been, a resident of Los Angeles
6 County, California.

7 3. In or around February 2021, I ordered a Tesla Model 3 Long Range vehicle
8 through the custom order tool on Tesla's website. In or around March 2021, I took delivery of
9 my Tesla vehicle.

10 4. After receiving my Tesla vehicle, I have noticed while driving the vehicle that I
11 do not receive the electric vehicle range originally advertised.

12 I declare under penalty of perjury under the laws of the United States and of the State of
13 California that the foregoing is true and correct.

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16 DATED: 08/01/2023

By: 

17 Bryan Perez
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ROMANEZ, ARTEM KUPRIETS, NEIL
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KENNETH BROWN, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

TESLA, INC. d/b/a TESLA MOTORS,
INC.,

Defendant.

Case No. 4:23-CV-03878-YGR

**VENUE DECLARATION OF
JAMES PORTER**

DEMAND FOR JURY TRIAL

1 I, JAMES PORTER, hereby declare and state as follows:

2 1. I am over the age of 18. The facts contained in this declaration are based upon
3 my personal knowledge, and if called upon to do so, I could and would testify competently
4 hereto.

5 2. I am, and at all times relevant to this Action have been, a resident of Sonoma
6 County, California.

7 3. In or around March 2022, I ordered a Tesla Model Y Performance vehicle through
8 the custom order tool on Tesla's website. In or around June 2022, I took delivery of my Tesla
9 vehicle by picking it up from the Tesla dealership in Vallejo, California.

10 4. After receiving my Tesla vehicle, I have noticed while driving the vehicle that I
11 do not receive the electric vehicle range originally advertised.

12 I declare under penalty of perjury under the laws of the United States and of the State of
13 California that the foregoing is true and correct.

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16 DATED: 08/01/2023

By: J Porter

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